

IN THE DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Jane Doe,)	Civil Action No.: <u>2:22-cv-03648-RMG</u>
)	
Plaintiff,)	NOTICE OF REMOVAL
)	
-versus-)	Removed from the Dorchester County
)	Court of Common Pleas
Dorchester School District Two,)	Case Number: 2022-CP-18-01445
)	
Defendant.)	
)	

**TO THE HONORABLE JUDGE OF THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA, CHARLESTON DIVISION**

Pursuant to 28 USC § 1441, Defendant Dorchester School District Two gives notice of the removal of Case Number: 2022-CP-18-01445 from the Court of Common Pleas for Dorchester County, South Carolina, to the United States District Court for the District of South Carolina, Charleston Division. In support of removal, Defendant Dorchester School District Two shows the following:

This civil suit commenced on September 16, 2022 by the filing of a Summons and Complaint in the Court of Common Pleas for Dorchester County. Upon information and belief, the Summons and Complaint [Exhibit A] was delivered by the US Postal Service to Dorchester School District Two, addressed to Christy Graham, Esquire as general counsel for the School District, marked certified mail. It is unknown if same was marked restricted delivery, however it was delivered to an employee other than Mrs. Graham. An Affidavit of Service has not been filed by Plaintiff with the Dorchester County Clerk of Court. Lisa A. Reynolds, Esquire appears for Defendant Dorchester School District Two.

The Complaint alleges causes of action arising under and deprivation of rights secured by the Laws of the United States of America. As such, the United States District Court has original jurisdiction over this action pursuant to 28 USC § 1331. The Defendant may remove this suit to the United States District Court as one or more of the claims arise under the laws of the United States of America. 28 USC § 1441

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/s/ Lisa A. Reynolds

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October _20_, 2022
Charleston, South Carolina